Message

From: Gross-Davis, CarolAnn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C2239389429848BFB670A8B2D97DF908-CDAVISGR]
Sent: 1/15/2020 2:59:21 PM
To: Jessica Fry (fry.jessica@epa.gov) [fry.jessica@epa.gov]
Subject: FW: PES fence line data that covers the explosion
Attachments: PA_FLM Philadelphia Energy Solutions 2019 Q3_11-14-19.xlsx; 2019 March June 20 BFL FLM Philadelphia Energy Solutions Q2.xlsx

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From: Werner, Lora S. (ATSDR/DCHI/EB) <lkw9@cdc.gov>
Sent: Tuesday, January 14, 2020 4:59 PM
To: Gross-Davis, CarolAnn <Gross-Davis.CarolAnn@epa.gov>; Kelly, Jack (R3 Phila.) <Kelly.Jack@epa.gov>
Cc: Helverson, Robert (ATSDR/DCHI/EB) <gfu6@cdc.gov>; Markiewicz, Karl (ATSDR/DCHI/EB) <kvm4@cdc.gov>; yjp8@cdc.gov; ran2@cdc.gov; Harden, DeAndrea (CDC/DDPHSIS/CSTLTS/DPIFS) <pyc9@cdc.gov>
Subject: Fwd: PES fence line data that covers the explosion

Thanks, Carol Ann. I am grateful to finally have this fenceline information that we have been asking for since June last year. It is so frustrating that it took so long. I tried calling you both today but Jack I know you are in the field and Carol Ann I suspect you have been pulled into a lot of meetings.

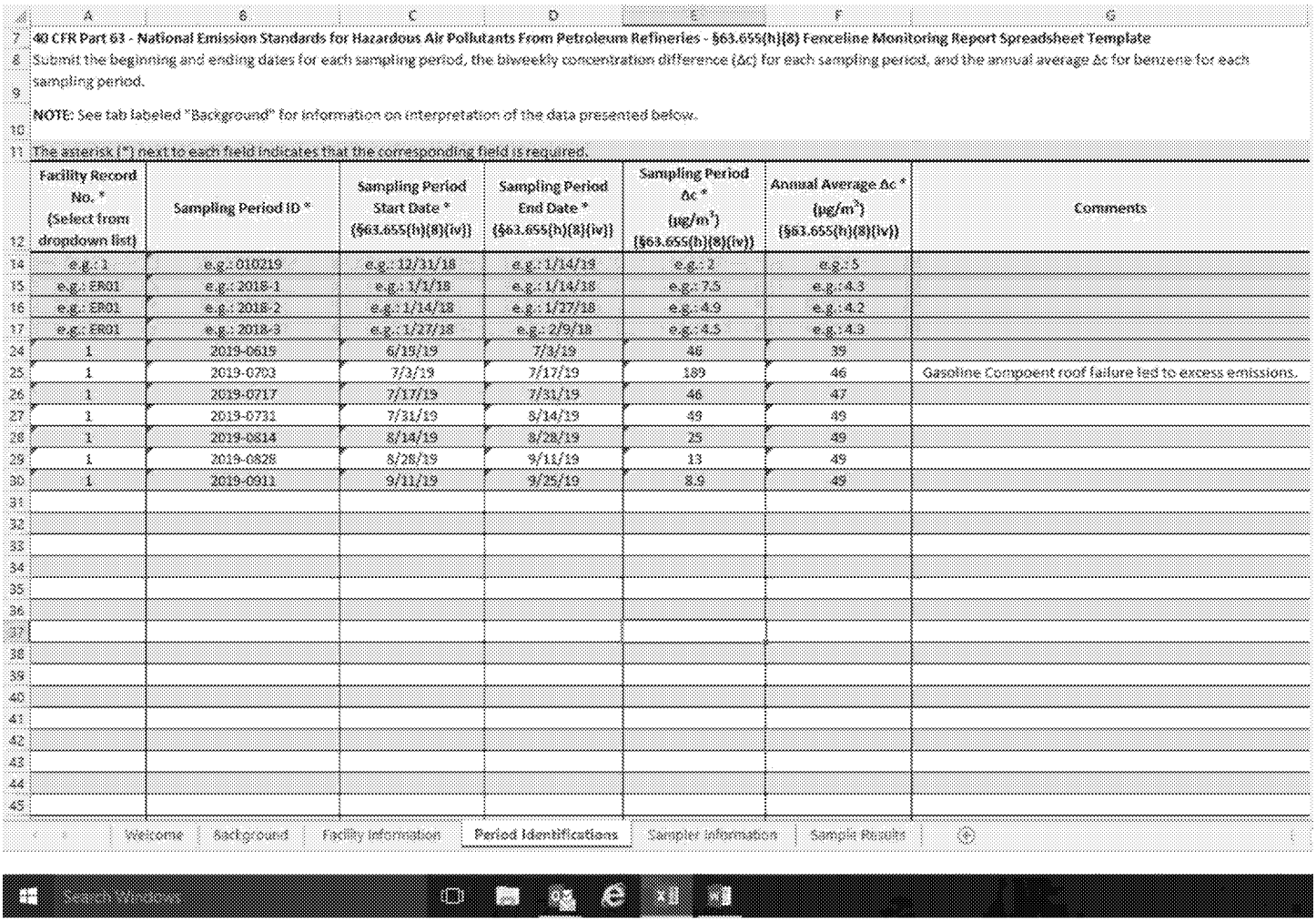
I shared screenshots below of the summary information for the period we had before (4/10-6/19/19) which is right up until the fire, and then the one you just shared, Carol Ann (6/20-9/25/19). I am not sure the screenshots are forwarding properly though - these are just from one of the tabs in each of the attached spreadsheets. All the averages appear higher in the two week intervals post the fire than when the facility was operating. Note the max result for location 1, monitoring period 2019-0703, which was 190 ug/m3 over that two week period and exceeded the instrument calibration. It is noted in the summary chart a "gasoline component failure led to excess emissions." This was in the next monitoring period after the one that included the fire on 6/20/19.

All these 2 week averages exceed ATSDR's chronic/intermediate/acute ATSDR minimal risk levels for benzene in air (9.6,19, and 29 ug/m3, respectively), meaning these exposures would warrant further public health evaluation for non cancer health effects. These levels also exceed our cancer risk evaluation guideline (0.13), which is intended to screen longer term cancer risk.

This information leads to a question of whether ongoing benzene emissions from this site are still a concern - in which case it should be a high priority to implement actions to understand what is going on and mitigate these emissions. My understanding is that this fenceline monitoring is not designed to produce data to address acute concerns/facilitate actions during a refinery shutdown with a lot of variability like this one – it is supposed to increase transparency and empower nearby communities with data about emissions at the fenceline for an operating refinery under routine conditions, right? So if this is not already happening, in my personal opinion there should be robust on site monitoring that would identify ongoing emission sources as shutdown activities proceed and enable rapid assessment of how to

address them. Others in my group are considering this info, this is just my immediate, personal thoughts. And I readily admit I do not have a picture of current on-site conditions and activities.

Lora



40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries - §63.655(h)(8) Fenceline Monitoring Report Spreadsheet Template

Submit the beginning and ending dates for each sampling period, the biweekly concentration difference (Δc) for each sampling period, and the annual average Δc for benzene for each sampling period.

NOTE: See tab labeled "Background" for information on interpretation of the data presented below.

The asterisk (*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list)	Sampling Period ID *	Sampling Period Start Date * (§63.655(h)(8)(iv))	Sampling Period End Date * (§63.655(h)(8)(iv))	Sampling Period Δc * ($\mu g/m^3$) (§63.655(h)(8)(iv))	Annual Average Δc * ($\mu g/m^3$) (§63.655(h)(8)(iv))	Comments
e.g.: 1	e.g.: 010219	e.g.: 12/31/18	e.g.: 1/14/19	e.g.: 2	e.g.: 5	
e.g.: ER01	e.g.: 2018-1	e.g.: 1/1/18	e.g.: 1/14/18	e.g.: 7.5	e.g.: 4.3	
e.g.: ER01	e.g.: 2018-2	e.g.: 1/14/18	e.g.: 1/27/18	e.g.: 4.9	e.g.: 4.2	
e.g.: ER01	e.g.: 2018-3	e.g.: 1/27/18	e.g.: 2/9/18	e.g.: 4.5	e.g.: 4.3	
1	2019-0619	6/19/19	7/3/19	46	39	
1	2019-0703	7/3/19	7/17/19	189	46	Gasoline Compoent roof failure led to excess emissions.
1	2019-0717	7/17/19	7/31/19	46	47	
1	2019-0731	7/31/19	8/14/19	49	49	
1	2019-0814	8/14/19	8/28/19	25	49	
1	2019-0828	8/28/19	9/11/19	13	49	
1	2019-0911	9/11/19	9/25/19	8.9	49	

Welcome | Background | Facility Information | Period Identifications | Sampler Information | Sample Results

	A	B	C	D	E	F
7	**40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries - §63.655(h)(8) Fenceline Monitoring Report Spreadsh**					
8	Submit the beginning and ending dates for each sampling period, the biweekly concentration difference (Δc) for each sampling period, and the annual aver					
9	sampling period.					
10	**NOTE:** See tab labeled "Background" for information on interpretation of the data presented below.					
11	The asterisk (*) next to each field indicates that the corresponding field is required.					
12	**Facility Record No. * (Select from dropdown lis**	**Sampling Period ID ***	**Sampling Period Start Date * (§63.655(h)(8)(iv)[1]**	**Sampling Period End Date * (§63.655(h)(8)(iv)[1]**	**Sampling Period Δc * (µg/m³) (§63.655(h)(8)(iv)**	**Annual Average Δc * (µg/m³) (§63.655(h)(8)(iv)[1]**
14	e.g.: 1	e.g.: 010219	e.g.: 12/31/18	e.g.: 1/14/19	e.g.: 2	e.g.: 5
15	e.g.: ER01	e.g.: 2018-1	e.g.: 1/1/18	e.g.: 1/14/18	e.g.: 7.5	e.g.: 4.3
16	e.g.: ER01	e.g.: 2018-2	e.g.: 1/14/18	e.g.: 1/27/18	e.g.: 4.9	e.g.: 4.2
17	e.g.: ER01	e.g.: 2018-3	e.g.: 1/27/18	e.g.: 2/9/18	e.g.: 4.5	e.g.: 4.3
24	1	2019-0327	3/27/2019	4/10/2019	30	29
25	1	2019-0410	4/10/2019	4/24/2019	48	30
26	1	2019-0424	4/24/2019	5/8/2019	16	30
27	1	2019-0508	5/8/2019	5/22/2019	189	37
28	1	2019-0522	5/22/2019	6/5/2019	13	37
29	1	2019-0605	6/5/2019	6/19/2019	41	38
30						
31						
32						

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Let me know what you think?

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